

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY
CORPORATION, as assignee of
individuals who are Covered
Persons, JANE DOE-1, a law
enforcement officer, JANE DOE-2,
a law enforcement officer, EDWIN
MALDONADO, SCOTT
MALONEY, JUSTYNA
MALONEY, PATRICK
COOLIGAN, and WILLIAM
SULLIVAN,

Plaintiffs,

v.

FORTNOFF FINANCIAL, LLC,
RICHARD ROES 1-10, fictitious names of
unknown individuals and ABC
COMPANIES 1-10, fictitious names of
unknown entities,

Defendants.

Case No.: 3:24-cv-04390

**APPLICATION OF FORTNOFF
FINANCIAL, LLC FOR AN
EXTENSION OF TIME TO
ANSWER, MOVE, OR
OTHERWISE REPLY PURSUANT
TO LOCAL RULE 6.1(b)**

Pursuant to Local Rule 6.1(b), application is hereby made for a Clerk's Order extending the time within Fortnoff Financial, LLC ("Fortnoff") may answer, move, or otherwise reply to the Complaint filed by Plaintiffs. It is represented that:

1. No previous extension has been obtained on Fortnoff's behalf;
2. Plaintiffs initiated this action by filing a Complaint in the Superior Court of New Jersey Law Division, Mercer County, on February 7, 2024.
3. Fortnoff removed this action to the District of New Jersey on March 29, 2024.

4. Pursuant to Fed. R. Civ. P. 81(c)(2)(C), the time for Fortnoff to answer, move, or otherwise reply would expire on April 5, 2024 (*i.e.*, seven (7) days after removal to federal court); and

5. Fortnoff applies for an extension of 14 days to answer, move, or otherwise reply to Plaintiffs' Complaint through April 19, 2024.

Dated: April 3, 2024.

Respectfully submitted,

/s/ J. Timothy McDonald

J. Timothy McDonald (ID No. 027201990)

Jennifer A. Adler (*Pro Hac Vice Motion*
forthcoming)

THOMPSON HINE LLP

Two Alliance Center

3560 Lenox Road, Suite 1600

Atlanta, Georgia 30326

Phone: 404.541.2900

Fax: 404.541.2906

Tim.McDonald@thompsonhine.com

Jennifer.Adler@thompsonhine.com

Steven G. Stranksy (*Pro Hac Vice Motion*
forthcoming)

THOMPSON HINE LLP

3900 Key Center

127 Public Square

Cleveland, Ohio 44114

Phone: 216.566.5500

Fax: 216.566.5800

Steve.Stransky@thompsonhine.com

*Attorneys for Defendant Fortnoff Financial,
LLC*

CERTIFICATE OF SERVICE

I, J. Timothy McDonald, hereby certify that I caused a true and correct copy of the foregoing **Application of Fortnoff Financial, LLC for an Extension of Time to Answer, Move, or Otherwise Reply Pursuant to Local Rule 6.1(b)** to be electronically filed with the Clerk of the District Court for the District of New Jersey using the CM/ECF system, and to be served upon counsel of record as set forth below, via email and Federal Express delivery:

Rajiv D. Parikh
Kathleen Barnett Einhorn
Genova Burns LLC
494 Broad Street
Newark, NJ 07102
rparikh@genovaburns.co,
Keinhorn@genovaburns.com

John A Yanchunis
Morgan & Morgan
201 N. Franklin Street
7th Floor
Tampa, FL 33602
jyanchunis@forthepeople.com

/s/ J. Timothy McDonald
J. Timothy McDonald (ID No. 027201990)